

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

No. 7:23-CV-897

IN RE:)
)
CAMP LEJEUNE)
WATER LITIGATION)
)
This Document Relates to:)
ALL CASES)
)

**DECLARATION OF
WHITNEY WALLACE WILLIAMS**

I, Whitney Wallace Williams, declare as follows:

1. I am a citizen and resident of Rowan County, North Carolina.
 2. I am over the age of 18 years and suffer from no mental disability. I am competent to testify concerning the matters stated herein, and the statements contained in this Declaration are based upon my personal knowledge.
 3. I am an attorney at Wallace & Graham, PA and am licensed to practice law in the State of North Carolina.
 4. My firm is handling a number of claims and actions under the Camp Lejeune Justice Act.
 5. On April 2, 2024, I emailed Danielle P. Bianchi, Deputy Director, Headquarters Element, Camp Lejeune Claims Unit, Office of the Judge Advocate General, Department of the Navy identifying our firm as being in Plaintiff Leadership Group and advising that our firm had been using the new claims portal

and had a number of questions not answered in the FAQs or within the portal instructions.

6. Same day, Ms. Bianchi requested that I put the inquiries in writing so that they could be discussed with a technical contractor, who would assist with answering questions.

7. On April 3, 2024, I submitted a number of questions by email to Ms. Bianchi. These questions concerned the Department of the Navy's rules and procedures for submitting CLJA administrative claims and supporting documents for those claims to the Navy.

8. On April 11, 2024, Ms. Bianchi emailed me with responses to my questions. Her responses are in red type. Attached as Exhibit A is a true and correct copy of the email chain between myself and Ms. Bianchi's to include my questions and her responses.

9. On April 15, 2014, I reached out via phone and email to Ms. Bianchi to advise that Plaintiff Leadership Group was in the process of working on briefing and I had shared the provided answers with them, and that the answers had been helpful to understand the Department of Navy's position on various issues, including presentment and probate. I asked Ms. Bianchi to confirm that the answers represented Department of Navy's positions and Plaintiff Leadership Group was able to use the answers to better understand the DON's position for briefing purposes.

10. On April 16, Ms. Bianchi responded that DON leadership team was drafting a reply given the interest of Plaintiff Leadership Group.

11. At the time of this Declaration, I have not received a reply from Ms. Bianchi.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: 4/16/24



Whitney Wallace Williams